

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TYLER ERDMAN,

*Plaintiff,*

against

ADAM VICTOR,

*Defendant.*

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Case No.: 1:20-cv-04162  
(LGS)(GWG)

**AFFIDAVIT OF ADAM  
VICTOR**

STATE OF NEW YORK

ss:

COUNTY OF NEW YORK

1. I am the Defendant in the abovementioned action and I make this sworn statement in accordance with the Order of the Honorable Gabriel W. Gorenstein dated July 26, 2022 in which he ordered that I turn over all documents requested by the Plaintiff in my “custody and control.”

2. To the best of my knowledge and belief, all of the documents in repositories under my direct custody and control were in hard drives in the possession of Setec, a forensics firm, and those documents have already been produced to the Plaintiff.

3. According to Your Honor’s Order, the persons mentioned in my discovery responses that possessed certain knowledge or responsive documents were Sonia Bozic, Oksana Chumanenko, Yigal Zohar, Francisco Filho, Steve Ingenito, Richard Bradish, Juan Perez, Ken Lazar, Pat Timlin, Viktor, Gil Kinderland, Louis Freeh, the firm of Schlam Stone, and the firm of Davidoff Hutcher.

4. I reached out to Sonia Bozic through the school she is working at in Belgrade, Serbia. She produced about 12 documents of all she had concerning Tyler Erdman. Four of the documents are privileged and will be included in the updated privilege log. One is an Affidavit from Greg DeJong which was produced as part of pending litigation between the parties in the Supreme Court of the State of New York, Index No. 158981/14. The rest were non-responsive to the interrogatories and document requests.

5. Oksana Chumanenko was, to the best of my knowledge, living in the Ukraine. She was eight months pregnant when the Russians invaded Europe and she is now a refugee somewhere in Europe. I have no way of reaching her.

6. My attorneys sent an email to Yigal Zohar requesting the documents in question. We have not received a response at this juncture.

7. My attorneys sent an email to Francisco Filho. The message was returned as “undeliverable”, therefore I have no further way of contacting him.

8. My attorneys sent an email to Steve Ingenito requesting the documents in question. We have not received a response at this juncture.

9. My attorneys sent an email to Richard Bradish requesting the documents in question. We have not received a response at this juncture.

10. My attorneys reached out to Juan Perez via telephone. He refused to speak to them on the phone. I have no other way of reaching him.

11. I have fallen out of touch with Ken Lazar and have no way of presently reaching him.

12. My attorneys sent an email to Pat Timlin requesting the documents in

question. We have not received a response at this juncture.

13. I have fallen out of touch with Viktor and have no way of presently reaching him.

14. My attorneys sent an email to Gil Kinderland requesting the documents in question. We have not received a response at this juncture.

15. My attorneys sent an email to Judge Eugene R. Sullivan, who is counsel at a firm in which the son of Louis Freeh is a partner. Judge Sullivan is the only person I know who would have a way of reaching Louis Freeh. My attorneys have not received a response at this juncture.

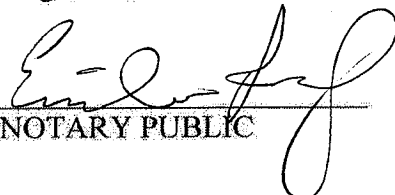
16. The court was already notified by the Plaintiff of the charging lien on my file imposed by Schlam Stone.

17. My attorneys reached out to Joshua Krakowsky at Davidoff Hutcher and were told he had already sent all of my documents to Jon Silveri, Esq. in September 2020, who then produced them to my current counsel. Most of those documents are privileged and have been included in the privilege log, and all other documents were included in the Setec production.

Dated: Brooklyn, New York  
August 30, 2022

  
ADAM VICTOR

Sworn to before me on  
August 30, 2022

  
NOTARY PUBLIC

EMILIO RODRIGUEZ  
Notary Public, State of New York  
Registration No. 02RO6321688  
Qualified in Queens County  
Commission Expires July 30, 2023